



U.S. Department of Justice

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United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 1, 2020

**BY ECF**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Abreu*, 19 Cr. 821 (KMW)**

Dear Judge Wood:

The Government respectfully writes with the consent of counsel for all defendants to provide a status update to the Court and to request an adjournment of the next status conference in this case. Discovery is currently complete and plea offers have been extended to all defendants. The next scheduled conference is currently set for September 8, 2020. In light of the current health situation, the parties respectfully request that the conference be adjourned to a date convenient for the Court. The parties further request that the time between September 8, 2020 and the date of the next conference be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interest of justice, both in light of the current health situation and so that the parties can continue their plea discussions.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

by: /s/  
Celia V. Cohen  
Assistant United States Attorney  
(212) 637-2466

*The conference scheduled for September 8, 2020 is adjourned to November 12, 2020, at 2:00 PM.*

*If the Government seeks an exclusion of Speedy Trial time, it should submit a Proposed Order.*

SO ORDERED, N.Y., N.Y.

9/1/20

*Kimba M. Wood*  
KIMBA M. WOOD  
U.S.D.J.